



October 19, 2015

**VIA ECF**

Honorable Lorna G. Schofield  
United States District Court  
Southern District of New York  
Thurgood Marshall Courthouse  
40 Foley Square  
New York, NY 10007

Re: *In re Foreign Exchange Benchmark Rates Antitrust Litigation*  
Case No. 1:13-cv-07789-LGS (S.D.N.Y.)

Dear Judge Schofield:

Class Plaintiffs write pursuant to Rules III.B.1 and III.B.3 of Your Honor's Individual Rules and Procedures for Civil Cases to respectfully request leave to file in support of Class Plaintiffs' Motion for Preliminary Approval of Settlement Agreements with Bank of America, Barclays, BNP Paribas, Citigroup, Goldman Sachs, HSBC, JPMorgan, RBS, and UBS: (1) a memorandum of law not to exceed 40 pages; (2) a declaration from lead counsel not to exceed 40 pages; (3) a declaration from Kenneth Feinberg not to exceed 40 pages; and (4) certain exhibits in excess of 15 pages.

The memorandum of law will address the merits of nine settlements and move for certification of two settlement classes. Class Plaintiffs believe the additional pages requested for the memorandum of law will provide information about the settlements that will assist the Court and class members to evaluate the settlement and the relief requested.

The declaration from the undersigned lead counsel will set forth the relevant procedural history of the litigation, summary of the settlement terms, and summary of the settlement negotiations for the nine settlements. The declaration will also provide information about the settlements that will assist the Court and class members to evaluate the settlement and the relief requested.

The declaration from Kenneth Feinberg will summarize the settlement negotiations for the nine settlements and provide additional information about the settlements that will assist the Court and class members to evaluate the settlement and the relief requested.

The declaration from lead counsel in support of the motion will attach the nine settlement agreements as exhibits, and each is approximately 95 pages. The declaration will also attach as an exhibit a table comparing the aggregate partial settlement reached in this action to settlements

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in prior antitrust class action cases where there were parallel criminal investigations and private settlements. This table will exceed 15 pages.

Accordingly, Class Plaintiffs respectfully request leave to file: (1) a memorandum of law not to exceed 40 pages; (2) a declaration from lead counsel not to exceed 40 pages; (3) a declaration from Kenneth Feinberg not to exceed 40 pages; and (4) the above-described exhibits, which are over 15 pages in length. Class Plaintiffs anticipate filing the motion very shortly.

Very truly yours,

/s/ Christopher M. Burke

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